

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR DIVISION POLICY STATEMENT NO. 2-96

**SUBJECT:** Coal Processing Plants

**REFERENCES:** Code of Virginia, Applicable State and Federal Statutes and Regulations

**EFFECTIVE DATE:** April 22, 1996

**I. PURPOSE:**

This policy sets forth the procedures for permitting and other activities associated with coal processing facilities.

**II. BACKGROUND:**

With EPA's 'Potential to Emit' January, 1995, Policy and subsequent court cases on potential to emit, there is some level of confusion over the proper course of action regarding coal facilities.

**III. STATEMENT OF POLICY:**

**A. DEFINITIONS:**

"Potential to emit" means the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment, and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design only if the limitation or its effect on emissions is state and federally enforceable.

Recent court cases allow either state or federal enforceability, not both. Also, EPA has become more flexible in allowing states to consider the VW real world," so with underground mines we can consider the fact that the coal will be very wet when it reaches the surface.

Coal Preparation Plant, as interpreted by Virginia, means - Many facility (excluding underground mining operations) which prepares coal by one or more of the following processes:

- Breaking

- Crushing
- Screening
- Wet or Dry Cleaning and Thermal Drying"

In other words, a coal preparation plan has to have a thermal dryer.

## **B. PERMITTING**

The purpose of a permit is to regulate and/or require controls where there is a potential threat to the ambient air quality standards that have been established to protect public health. Mine mouth coal processing operations need not be permitted unless they exceed the permit exemption levels in Appendix R of the Board's regulations. Since the coal from such operations is normally dripping wet, it is unlikely that Appendix R exemption levels will be exceeded.

Complex coal sites which may include several of the following operations:

- Tramp Iron Removal
- Breaker
- Screening
- Crushing
- Cleaning - Mechanical or Pneumatic
- JIG Table Washing Plants
- Thermal Drying
- Storage
- Shipping

will likely exceed the exemption levels in Appendix R and need a permit. A schematic plant diagram is attached to illustrate what Virginia would categorize as a complex facility or a coal preparation plant.

APPROVED:

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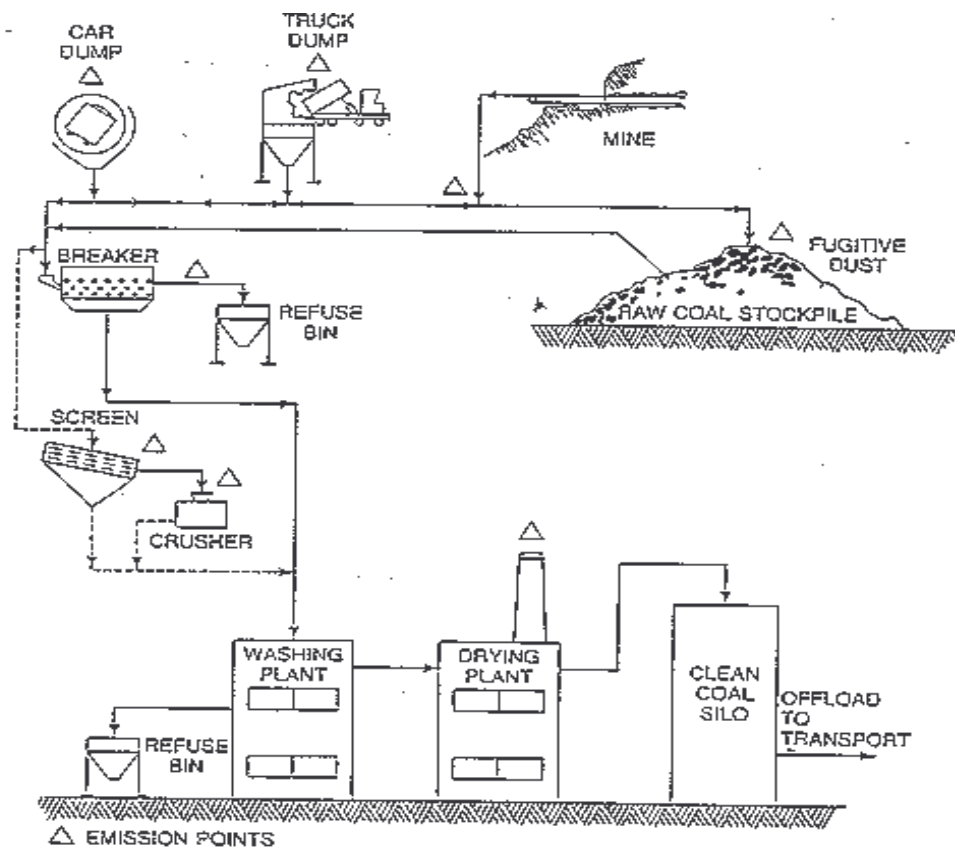


FIGURE 1. Typical Coal-Processing Plant Schematic (Revised from Reference 2)

Source: Air Pollution Engineering Manual – Air and Waste Management Association